

SFA Name:	Mondovi School District 63668
Administrative Review Conducted on:	3/30/2017
Sites Selected for Review:	Mondovi Elementary School
Date Corrective Action Plan was provided to SFA:	19-Apr-17

**Due Date for Corrective Action Plan:** 

18-May-17

# **Commendations & Suggestions**

Congratulations, the applications were all completed accurately.

Thank you for your kind accommodations during a very busy time for the school. The review paperwork was organized and easy to review.

The kitchen staff were very friendly with the students and did a great job serving.

## Other areas of Technical Assistance (NOT requiring Corrective Action)

Menu Review- technical assistance was provided in an email to the SFA with the menu review results. Suggestions were provided to bring the menus into compliance.

Professional Standards - technical assistance was provided regarding counting all staff that have duties related to the school lunch program including non-nutrition staff.

### Finding #1

410. For the week of menu review, the K-5 breakfast menu did not meet the minimum daily requirement of 1 ounce equivalent grain. A grain was provided, however the minimum required portion size was not met on Monday and the Raisin Bran cereal served this week was not whole grain rich.

During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement contain the required components in the minimum portion size required for the specific grade group. The SFA should review all menus to ensure that at least the minimum portion size is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include what to do if a certain planned menu item is not available or if the item runs out during service. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. http://healthymeals.nal.usda.gov/

## **Regulation / Citation and Summary**

220.8(c) Meal pattern for school breakfasts. A school must offer the food components and quantities required in the breakfast meal pattern established. K-12: 1 oz. equivalent of grains daily.

## **SFA Suggested Guidance for Compliance**

To come into compliance with meal pattern requirements, the SFA must provide the State Agency with a written plan that will be implemented to ensure future compliance. The plan should include; a statement that all menus will be reviewed to ensure that all portion sizes planned meet at least the minimum required amount for the specific grade group, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide any needed documentation to support the changes such as labels, recipes, production records, etc.

## **SFA Response**

### Finding #2

410. For the menu review week, the K-5 breakfast menu did not meet the 100% Whole Grain Rich requirement. Not all grains provided were Whole Grain Rich.

During the review requirements for the meal pattern were reviewed with the SFA. All grains provided as part of the reimbursable meal must be Whole Grain Rich. To be considered Whole Grain Rich the item it must be comprised of at least 50% whole grain ingredients. An easy way to determine if a pre-purchased item is whole grain is to look at the ingredient list. If the first ingredient is whole grain, it is a Whole Grain Rich product. If the first ingredient is water, but the second is a whole grain it is also a Whole Grain Rich product. If the SFA is using a recipe as long as the whole grain ingredient is the largest by weight of all of the grain ingredients combined it is a Whole Grain Rich product. For additional information on whole grains visit the USDA FNS website. http://healthymeals.nal.usda.gov/menu-planning/whole-grains

## **Regulation / Citation and Summary**

220.8(c)(2)(iv) Grains component. (A) Enriched and whole grains. All grains must be made with enriched and whole grain meal or flour, in accordance with the most recent FNS guidance on grains. Whole grain-rich products must contain at least 50 percent whole grains and the remaining grains in the product must be enriched. Effective July 1, 2013 (SY 2013-2014), schools may substitute meats/meat alternates for grains, after the daily grains requirement is met, to meet the weekly grains requirement. One ounce equivalent of meat/meat alternate is equivalent to one ounce equivalent of grains.

## **SFA Suggested Guidance for Compliance**

To come into compliance with meal pattern requirements, the SFA must provide the State Agency with a written plan that will be implemented to ensure future compliance with the Whole Grain Rich requirements. The plan should include; a statement that only Whole Grain Rich grain products will be used as part of the reimbursable meal, a statement that all labels/recipes/manufacturer statements will be kept on file to document the Whole Grain Rich compliance, and a statement that additional menu training will be provided to SFA staff. Provide the outline for the training and the dates that the training(s) will be completed. In the plan include the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. In addition to the plan please submit a revised menu from the week of review that clearly identifies the products that have been changed to bring the menu into compliance, submit any needed supporting documentation such as labels, recipes, and/or manufacturer statements. The Raisin Bran cereal served this week was not whole grain rich.

### **SFA Response**

### Finding #3

410. For the week of menu review, the K-5 lunch menu did not meet the minimum daily requirement of 1 ounce equivalent grain. A grain was provided, however the minimum required portion size was not met on Thursday.

During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement contain the required components in the minimum portion size required for the specific grade group. The SFA should review all menus to ensure that at least the minimum portion size is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include what to do if a certain planned menu item is not available or if the item runs out during service. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. http://healthymeals.nal.usda.gov/

## **Regulation / Citation and Summary**

210.10(c) Meal pattern for school lunches. Schools must offer the food components and quantities required in the lunch meal pattern established: K-5: 1 oz. equivalent daily grain.

# **SFA Suggested Guidance for Compliance**

To come into compliance with meal pattern requirements, the SFA must provide the State Agency with a written plan that will be implemented to ensure future compliance. The plan should include; a statement that all menus will be reviewed to ensure that all portion sizes planned meet at least the minimum required amount for the specific grade group, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide any needed documentation to support the changes such as labels, recipes, production records, etc.

#### **SFA Response**

### Finding #4

410. For the week of menu review, the K-5 lunch menu did not meet the minimum weekly requirement of 8 ounce equivalent grain.

During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement meet the weekly requirements as well as the daily requirements for grains required for the specific grade group. The SFA should review all menus to ensure that at least the minimum daily and weekly requirement is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include how to determine the total number of weekly servings if there are multiple menu items each day. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. http://healthymeals.nal.usda.gov/

## **Regulation / Citation and Summary**

210.10(c) Meal pattern for school lunches. Schools must offer the food components and quantities required in the lunch meal pattern established: K-5: minimum of 8 oz. equivalent of grains per week.

# **SFA Suggested Guidance for Compliance**

To come into compliance with meal pattern requirements, the SFA must provide the State Agency with a written plan that will be implemented to ensure future compliance. The plan should include; a statement that all menus will be reviewed to ensure that all weekly requirements for grains are met for the specific grade group, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide any needed documentation to support the changes such as labels, recipes, production records, etc.

# **SFA Response**

## Finding #5

410. For the week of menu review, the K-5 lunch menu did not meet the minimum weekly requirement of 1/2 cup dark green vegetable subgroup.

During the review, the portion sizes required by the meal patterns were discussed with the SFA. The SFA must ensure that all meals counted for reimbursement contain the required components in the minimum portion size required for the specific grade group. This includes meeting the weekly requirements for the vegetables sub-groups. Over the course of the standard school week the SFA must at a minimum meet the required servings for each sub-group. The SFA should review all menus to ensure that at least the minimum serving for each sub-group is planned for the specific grade group. The SFA should also provide additional training to the kitchen staff on the requirements of a reimbursable meal. The training should include what to do if a certain planned menu item is not available or if the item runs out during service. The USDA FNS website can be used for training materials, resources and guidance on the meal pattern. http://healthymeals.nal.usda.gov/

# **Regulation / Citation and Summary**

210.10(c) (iii) Vegetables component. Vegetable offerings at lunch over the course of the week must include the vegetable subgroups, as defined in this section in the quantities specified in the meal pattern in paragraph (c) of this section: K-12: 1/2 C dark green.

# **SFA Suggested Guidance for Compliance**

To come into compliance with meal pattern requirements, the SFA must provide the State Agency with a written plan that will be implemented to ensure future compliance. The plan should include; a statement that all menus will be reviewed to ensure that all weekly requirements for grains are met for the specific grade group, a process for sites to reference when they do not have one of the planned menu items or there is insufficient quantities, a statement that the serving line will be visually reviewed prior to service to confirm that all required components are available and that additional menu training for all SFA staff will be provided. Provide the outline and dates for the trainings that will be completed. In addition please submit the name(s) and title(s) of the SFA representative(s) that will oversee this area and ensure future compliance. Submit the menu from the week of review with the corrections that were made to the menu to bring it into compliance moving forward. Provide any needed documentation to support the changes such as labels, recipes, production records, etc.

#### **SFA Response**

## Finding #6

Resource Management - Paid Lunch Prices

The SFA incorrectly reported paid lunch prices to the State Agency.

The SFA submitted the incorrect paid lunch prices for both SY 15-16 & SY 16-17. Last year the SFA charged \$2.55 & \$2.75, but the paid lunch prices are listed as \$2.60 & \$2.80. Likewise, this year's paid lunch prices are listed as \$.05 higher than what is charged. The SFA should correct the prices for both years, and make sure they submit accurate pricing information to DPI on future applications.

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## **Regulation / Citation and Summary**

7 CFR 210.15 Reporting and recordkeeping. (a) Reporting Summary. Participating school food authorities are required to submit forms and reports to the State agency or the distributing agency, as appropriate, to demonstrate compliance with Program requirements. These reports include, but are not limited to: (8) The prices of paid lunches charged by the school food authority.

# **SFA Suggested Guidance for Compliance**

As the corrective action response, the SFA should provide documentation showing that they have resubmitted the inaccurate applications with the correct prices. Additionally, explain how internal controls have been put into the place to ensure accurate pricing information will be submitted to DPI in the future.

## **SFA Response**

### Finding #7

Resource Management - NonProgram Food Revenue

Prior to the review, the SFA had not determined compliance with nonprogram food requirements.

#### **Technical Assistance Provided**

The NonProgram Food Revenue Tool (or DPI's NonProgram Price Calculator Tool) should be completed every year. During the review, the SFA completed the DPI tool as requested, and it showed the SFA was in compliance. A copy of the blank tool was sent to the SFA, and can also be found on the DPI website.

## **Regulation / Citation and Summary**

7 CFR 210.14 (f) Revenue from non-program foods. Beginning July 1, 2011, school food authorities

shall ensure that the revenue generated from the sale of non-program foods complies with the requirements in this paragraph.

- (1) Definition of non-program foods. For the purposes of this paragraph, non-program foods are those foods and beverages; (i) Sold in a participating school other than reimbursable meals and meal supplements; and (ii) Purchased using funds from the nonprofit school food service account.
- (2) Revenue from non-program foods. The proportion of total revenue from the sale of non-program foods to total revenue of the school food service account shall be equal to or greater than: (i) The proportion of total food costs associated with obtaining non-program foods (ii) The total costs associated with obtaining program and non-program foods from the account.

# **SFA Suggested Guidance for Compliance**

As the corrective action response, please explain the process that will be put into place to ensure that the USDA Nonprogram Food Revenue Tool or the DPI NonProgram Price Calculator Tool is completed each year. This should include a timeframe for when the tool will be completed, the name by position of the person responsible for completing the tool, and the steps that will be taken if the tool shows you are out of compliance.

# **SFA Response**

## Finding #8

The SFA's notice of adverse action did not contain all required information including the most current non-discrimination statement.

#### **Technical Assistance Provided**

During the review, the notice of adverse action was discussed with the SFA. In its notice, the SFA must include the information as outlined in the Eligibility Manual for School Meals, Chapter 4.

# **Regulation / Citation and Summary**

245.6a(j) Adverse action. If verification activities fail to confirm eligibility for free or reduced price benefits or should the household fail to cooperate with verification efforts, the school or local educational agency shall reduce or terminate benefits, as applicable, as follows: Ten days advance notification shall be provided to households that are to receive a reduction or termination of benefits, prior to the actual reduction or termination. The first day of the 10 day advance notice period shall be the day the notice is sent. The notice shall advise the household of: (1) The change; (2) The reasons for the change; (3) Notification of the right to appeal and when the appeal must be filed to ensure continued benefits while awaiting a hearing and decision; (4) Instructions on how to appeal; and (5) The right to reapply at any time during the school year. The reasons for ineligibility shall be properly documented and retained on file at the local educational agency.

# **SFA Suggested Guidance for Compliance**

To come into compliance with the requirements for notices of adverse action, the SFA must provide written assurance that staff conducting verification understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan, as well as a revised copy of the notice of adverse action.

## **SFA Response**

# Finding #9

The site had products in storage that violated the Buy American provision and no documentation was available to show domestic alternatives were considered. Additionally, the SFA was not sure if the Buy American clause is part of the product specification language.

### **Technical Assistance Provided**

The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports small local farmers and provides healthy choices for children in the school meal programs. Purchasing from these entities also supports the local economy. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.

The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Further, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

More information on this new requirement can be found on the SNT website at http://dpi.wi.gov/school-nutrition/procurement/buy-american including a tool to assist with tracking noncompliance products.

### **Regulation / Citation and Summary**

There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the "domestic" standard as described above ("non-domestic") in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.

### **SFA Suggested Guidance for Compliance**

To come into compliance with the Buy American requirement the SFA must provide a statement that they will ensure language is included in procurement documentation, ensure they are aware of and utilizing the procurement manual and, if appropriate, will use the tracking template to use to communicate with distributors.

## **SFA Response**

# Finding #10

The SFA is attempting to resolve complaints alleging discrimination within the FNS School Meal Programs.

#### **Technical Assistance Provided**

During the review the process for receiving and processing complaints alleging discrimination was discussed with the SFA. The SFA should not attempt to resolve complaints in-house and should forward all complaints to the appropriate outside agency.

## **Regulation / Citation and Summary**

FNS Instruction 113-1 Section XV All complaints, written or verbal, must be forwarded to the appropriate Regional or FNS OCR Director, unless an approved State complaint procedure is in place. Anonymous complaints will be handled as any other complaints, to the extent feasible, based on available information.

# **SFA Suggested Guidance for Compliance**

To come into compliance with civil rights requirements, the SFA must develop a procedure that will be put into place to handle any discrimination complaints and to forward them to an appropriate agency. The process must outline the steps that will be taken when a complaint is received, the name and contact information of the agency that the complaint will be forwarded to, and the name(s) and title(s) of the person(s) who will be responsible for forwarding complaints to the appropriate agency. Please submit the procedure as corrective action.

# **SFA Response**

### Finding #11

On-site monitoring was not completed for lunch.

#### **Technical Assistance Provided**

During the review, the requirement for on-site monitoring was reviewed with the SFA. It was determined that the SFA did not complete on-site monitoring by February 1st and an extension was not requested. Since the SFA has multiple sites they are required to monitor the lunch counting and claiming system for each site in the SFA prior to February 1st of each year unless an extension was requested by the SFA and approved by the State Agency.

#### **Regulation / Citation and Summary**

210.8(a)(1) On-site reviews. Every school year, each school food authority with more than one

school shall perform no less than one on-site review of the lunch counting and claiming system employed by each school under its jurisdiction. The on-site review shall take place prior to February 1 of each school year. Further, if the review discloses problems with a school's meal counting and claiming procedures, the school food authority shall: ensure that the school implements corrective action; and, within 45 days of the review, conducts a follow-up on-site review to determine that the corrective action resolved the problems. Each on-site review shall ensure that the school's claim is based on the counting system authorized by the State agency under §210.7(c) of this part and that the counting system, as implemented, yields the actual number of reimbursable free, reduced price and paid lunches, respectively, served for each day of operation.

# **SFA Suggested Guidance for Compliance**

As the corrective action response the SFA must complete the monitoring review for all sites within the SFA. Submit copies of the monitoring forms with the response. Please submit a process that will be put in place moving forward to ensure that all on-site reviews are completed prior to February 1st of each year. Additionally, please submit a process that will be put in place should an extension need to be requested from the State Agency. Please identify the name(s) and title(s) of the person(s) who will be responsible for completing on-site monitoring.

## **SFA Response**

# Finding #12

On-site monitoring was not completed for breakfast.

#### **Technical Assistance Provided**

During the review, the requirement for on-site monitoring was reviewed with the SFA. It was determined that the SFA did not complete on-site monitoring by February 1st and an extension was not requested. Since the SFA has multiple sites they are required to monitor the counting and claiming systems of a minimum of 50% of the sites offering breakfast in the SFA prior to February 1st of each year unless an extension was requested by the SFA and approved by the State Agency.

### **Regulation / Citation and Summary**

220.11 Reimbursement procedures. (d)(1)On-site reviews. Every school year, each school food

authority with more than one school shall perform no less than one on-site review of the breakfast counting and claiming system and the readily observable general areas of review identified under §210.18(h) of this chapter, as specified by FNS, for a minimum of 50 percent of schools under its jurisdiction with every school within the jurisdiction being reviewed at least once every two years. The on-site review shall take place prior to February 1 of each school year. Further, if the review discloses problems with a school's meal counting or claiming procedures or general review areas, the school food authority shall ensure that the school implements corrective action, and within 45 days of the review, conduct a follow-up on-site review to determine that the corrective action resolved the problems. Each on-site review shall ensure that the school's claim is based on the counting system and that the counting system, as implemented, yields the actual number of reimbursable free, reduced price and paid breakfasts, respectively, served for each day of operation.

# **SFA Suggested Guidance for Compliance**

As the corrective action response the SFA must complete the monitoring review for 50% of the sites offering breakfast within the SFA. Submit copies of the monitoring forms with the response. Please submit a process that will be put in place moving forward to ensure that on-site reviews are completed prior to February 1st of each year. Additionally, please submit a process that will be put in place should an extension need to be requested from the State Agency. Please identify the name(s) and title(s) of the person(s) who will be responsible for completing on-site monitoring.

## **SFA Response**

## Finding #13

1000. Finding The SFAs Local Wellness Policy does not contain all of the required components. The Wellness Policy does not include designation of one or more SFA officials in charge of school compliance oversight.

#### **Technical Assistance Provided**

During the review, Local Wellness Policies were discussed with the SFA. The Local Wellness Policy is required to contain the following: a designation of one or more SFA officials in charge of school compliance oversight; a plan for measuring compliance; goals for nutrition education, nutrition promotion, other school based activities to promote student wellness, and physical activity; and guidance for all foods available on school campus. The SFA should also contact the state agency to determine if there are any additional requirements from the state or if they have any state specific resources. The SFA was provided with the USDA link for Wellness Policies. http://www.fns.usda.gov/tn/local-school-wellness-policy

### **Regulation / Citation and Summary**

 $210.30\ Local\ School\ Wellness\ Policy.\ (c)\ Content\ of\ the\ plan.\ At\ a\ minimum,\ local\ school\ wellness$ 

policies must contain: (1) Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. In developing these goals, local educational agencies must review and consider evidence-based strategies and techniques; (2) Standards for all foods and beverages provided, but not sold, to students during the school day on each participating school campus under the jurisdiction of the local educational agency; (3) Standards and nutrition guidelines for all foods and beverages sold to students during the school day on each participating school campus under the jurisdiction of the local educational agency that; (i) Are consistent with applicable requirements set forth under §§ 210.10 and 220.8 of this chapter; (ii) Are consistent with the nutrition standards set forth under § 210.11; (iii) Permit marketing on the school campus during the school day of only those foods and beverages that meet the nutrition standards under § 210.11; and (iv) Promote student health and reduce childhood obesity. (4) Identification of the position of the LEA or school official(s) or school official(s) responsible for the implementation and oversight of the local school wellness policy to ensure each school's compliance with the policy; (5) A description of the manner in which parents, students, representatives of the school food authority, teachers of physical education, school health professionals, the school board, school administrators, and the general public are provided an opportunity to participate in the development, implementation, and periodic review and update of the local school wellness policy; and (6) A description of the plan for measuring the implementation of the local school wellness policy, and for reporting local school wellness policy content and implementation issues to the public, as required in paragraphs (d) and (e) of this section.

## **SFA Suggested Guidance for Compliance**

To come into compliance with the requirements for Local School Wellness Policies, the SFA must submit a written assurance that the appropriate staff understand the requirements for the wellness policy. Submit the name and title of the SFA representative that will oversee this process and ensure compliance.

#### **SFA Response**

## Finding #14

The SFA is selling items that do not meet the Smart Snacks nutrition standards for beverages sold to elementary school students during the school day.

#### **Technical Assistance Provided**

During the review, beverage rules under Smart Snacks were discussed with the SFA. The SFA must ensure that all beverages meet the requirements, based on the level of the school (elementary, middle, high) where they are sold. The SFA should review Smart Snack requirements online at: http://www.fns.usda.gov/healthierschoolday/tools-schools-focusing-smart-snacks

## **Regulation / Citation and Summary**

Smart Snacks interim final rule: Elementary School: Plain water or plain carbonated water (no size

limit); Low fat milk, unflavored ( $\leq 8$  fl oz.); Non fat milk, flavored or unflavored ( $\leq 8$  fl oz.), including nutritionally equivalent milk alternatives as permitted by the school meal requirements; 100% fruit/vegetable juice ( $\leq 8$  fl oz.); and 100% fruit/vegetable juice diluted with water (with or without carbonation), and no added sweeteners ( $\leq 8$  fl oz.).

# **SFA Suggested Guidance for Compliance**

To come into compliance with the requirements for Smart Snacks, the SFA must provide an assurance that the appropriate staff understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan, which must indicate that all competitive items sold are now in compliance with Smart Snacks rules. Please include the date in which all non approved items were removed and the person by position who will oversee that these items are not sold.

## **SFA Response**

# Finding #15

The SFA is not tracking training hours for all staff including non-nutrition staff.

### **Technical Assistance Provided**

During the on-site review, training requirements were discussed with the SFA. To be in compliance, the SFA must track the hours of training completed by all School Nutrition staff. For further information, please see the USDA's Guide to Professional Standards for School Nutrition Programs.

## **Regulation / Citation and Summary**

210.30(g) School food authority oversight. Each school year, the school food authority director must document compliance with the requirements of this section for all staff with responsibility for school nutrition programs, including directors, managers, and staff. Documentation must be adequate to establish, to the State's satisfaction during administrative reviews, that employees are meeting the minimum professional standards.

## **SFA Suggested Guidance for Compliance**

To come into compliance with the requirements for Professional Standards, the SFA must provide written assurance that the appropriate staff understand these requirements, and the SFA must put a plan in place to ensure future compliance. Please submit the assurance and plan, indicating how the SFA will ensure that all training is now being tracked.

# **SFA Response**

## Finding #16

Storage violations were observed on-site. The SFA had food that was not dated upon delivery. The SFA had food that was not stored 6 inches off the floor in both dry storage and freezer areas.

#### **Technical Assistance Provided**

During the review, storage requirements were discussed with the SFA. The SFA must ensure that all food is dated upon delivery. The SFA must ensure that all food is stored at least 6 inches off the floor.

# **Regulation / Citation and Summary**

210.13(a) Health standards. The school food authority shall ensure that food storage, preparation and service is in accordance with the sanitation and health standards established under State and local law and regulations.

210.13(d) (d) Storage. The school food authority shall ensure that the necessary facilities for storage, preparation and service of food are maintained. Facilities for the handling, storage, and distribution of purchased and donated foods shall be such as to properly safeguard against theft, spoilage and other loss.

## **SFA Suggested Guidance for Compliance**

To come into compliance with this finding the SFA must submit an assurance that the SFA is aware of the requirements for food storage and holding within the food safety guidelines. The assurance must include: a statement that all food items will be dated with the delivery date as well as the date the product was opened; and a statement that all food will be stored at least 6 inches off of the floor. include the person(s), by position, that will provide oversight to ensure compliance with food storage requirements now and in the future.

# **SFA Response**